

Dear FCC,

I am writing to offer Allstate Life Insurance Company's comments concerning the Federal Communications Commission's proposed revisions to the Telephone Consumer Protection Act. As a company that depends on the legitimacy and efficiency of telemarketing programs to grow and support its business, we are committed to conducting telemarketing programs that adhere to the highest ethical standards. It is with that background that we respectfully submit the following comments regarding the Commission's proposed revisions to the Act.

Comments of Allstate Life Insurance Company On The Proposed
Revisions To The Telephone Consumer Protection Act

CG Docket No. 02-278

We are a life insurance company based in Northbrook, IL, that out-sources the telemarketing of our products to third-party teleservices companies. We welcome any efforts by the FCC to investigate and eliminate fraud that involves telemarketing. However, we cannot support the revisions proposed by the Commission. The proposed revisions place too many burdensome restrictions on the thousands of companies like ours that have ethically used the telephone as a legitimate sales and marketing tool.

For the reasons set forth below, we are concerned that the FCC's attempts will do nothing to curtail the abusive and deceptive telemarketing practices of relatively few unethical companies, but will penalize the business practices of reputable companies and will have a disastrous impact on our company's ability to continue to conduct ethical and legal telemarketing programs.

In particular, we oppose the following provisions proposed by the FCC:

(1) Creation of a National Do-Not-Call List:

Federal law already provides an easy and efficient means for consumers to determine which calls they want to receive and which they want to prohibit. In contrast to the proposed FCC list, the existing Do Not Call (DNC) system empowers consumers to make their own decisions.

A. The industry has successfully provided consumers with a one-stop service to remove their names from all calling lists. The DMA's Telephone Preference Service offers consumers an easy, free, nationwide Do Not Call system that has already been created and will not require additional money to be expended by the FCC.

B. The states have already moved to address any perceived loopholes in the existing Do Not Call framework. Now approximately 25 states have DNC lists and more have been proposed. The states, which are in the best position to offer solutions to the concerns raised by their citizens, have looked at this situation and acted in a way that is appropriate for their constituents. The FCC's list would use taxpayer money to provide a service that is already offered to more than 60% of American citizens.

(2) Predictive Dialers

A. Predictive dialing devices are used by many telemarketing companies and make operation of such businesses much more cost effective by increasing productivity. Increased efficiency in marketing products and services over the phone through the use of predictive dialers helps reduce costs and ultimately saves consumers money. Any regulation that would render this technology unusable would result in significant, perhaps unacceptable, cost increases to the consumer.

We certainly respect the time the Commission has invested in studying these issues and its commitment to continue modifying these proposals. We urge the Commission to look at the overall negative impact that these proposals will have on jobs, our community and the economy as a whole.

Thank you for your consideration.

Teresa Logue
Assistant Vice President
Direct Response
Allstate Life Insurance Company